

# **Integrity Management**

**WUTC Pipeline Safety Seminar**

**May 25, 2005**



# Talking Points

- **Background – Why Integrity Management**
- **Important Dates – Pipeline Safety Improvement Act 2002**
- **Successful Program Development**
- **Program Development Resources**
- **OPS Implementation Plans**
- **Questions and Answers**

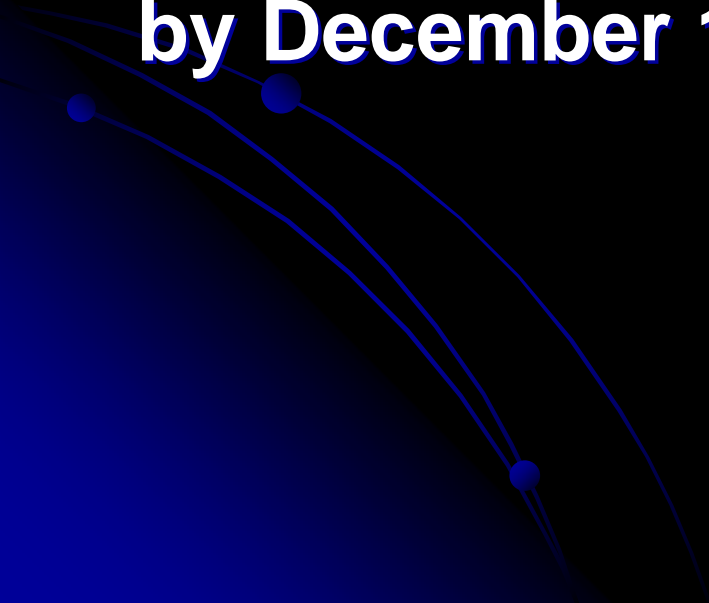
# **Why Integrity Management**

- **High Profile Incidents**

- **Prompted Congress to Include Pipeline Safety Requirements in the “Pipeline Safety Improvement Act of 2002”**
- **Fostered an Increase in Public Awareness**
- **Recognition of Ageing Infrastructure**
- **Supply Concerns**

# **Why Integrity Management**

## **Pipeline Safety Improvement Act of 2002:**

- **Signed by the President December 17, 2002**
  - **Required OPS to Publish IM Regulations by December 17, 2003**
- 

# OPS Approach to Integrity Management

- OPS Recognized Industry Safety Record
- Risk Management Demonstration Programs Provided Insight into the Solution: “Improved Management Systems”
- OPS Developed the IM Regulation with Focus Toward the Protection of People by Preventing Incidents in High Consequence Areas

# **OPS Approach to Integrity Management (Goals)**

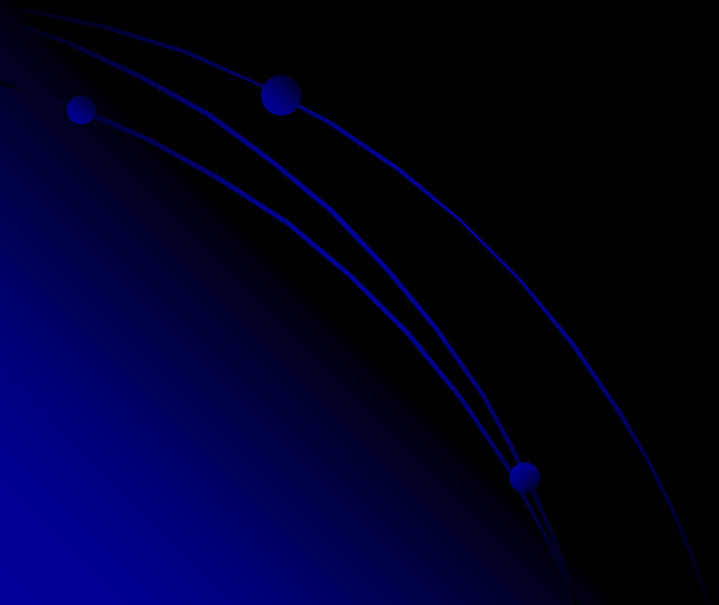
- **Accelerate Assessments of Pipelines in High Consequence Areas (HCAs)**
- **Promote Rigorous, Systematic Management of Pipeline Integrity**
- **Enhance Governmental Oversight of Pipeline Company Integrity Plans and Programs**
- **Increase Public Assurance in Pipeline Safety**

# OPS Approach to Integrity Management

- OPS Developed an Integrity Management Inspection Approach Focusing on:
  - Operator Processes for Managing Integrity
  - Operator Process Implementation
- This is the Basis of the Inspection Protocols

# **Important Dates Not Found In the Regulation!**

**Pipeline Safety Improvement Act of 2002**





# Begin Baseline Assessment

- By June 17, 2004, Each Operator Must Have Began Its Preparation to Conduct a Baseline Assessment on at Least One High Risk Segment That the Operator Has Already Identified
- Preparing to Conduct a Baseline Assessment Means That –

# Begin Baseline Assessment

## **Advisory Bulletin – Nov. 17, 2003:**

- An Operator Has Scheduled for Assessment the Segments Identified Prior to June 17, 2004; AND
- An Operator Has Started to Contract or Has Entered Into a Contract With a Tool Vendor to Assess the Identified Segments; Or

# Begin Baseline Assessment

## **Advisory Bulletin – Nov. 17, 2003:**

- An Operator Has Started to Assess the First Scheduled Segment.
- An Operator Has Installed Launchers or Receivers for Internal Inspection Devices; Or

# Begin Baseline Assessment

## **Advisory Bulletin – Nov. 17, 2003:**

- An Operator Has Set up a Segment for a Pressure Test; Or
- An Operator Has Completed the Pre-assessment Step for Direct Assessment.

# **Advisory Bulletin:** **NPMS Submission**

- **June 17, 2003 – Provide OPS:**
  - **Geospatial Data or Data in a Format that can be Readily Converted to Geospatial Data**
  - **Name and Address of Pipeline Operator**
  - **A Means for a Person of the General Public to Contact the Operator for Additional Information**

# Advisory Bulletin: NPMS Submission

- **Provide Updates Every 12-Months To:**

<http://www.npms.rspa.dot.gov/submissions/standards.htm>

- **If No Modification Have Occurred  
Send Email Stating this To:**
  - **opsgis@rspa.dot.gov**

Research and Special  
Programs Administration[HOME](#) | [RSPA HOME](#) | [OPS HOME](#) | [CONTACT](#)

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## National Pipeline Mapping System

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# PIMMA

## Pipeline Integrity Management Mapping Application

Select from the list below:

Pipeline Operator &gt;

Federal Government &gt;

State &amp; Local Government &gt;

[Click here for  
PIMMA Applications](#)

U.S. Department of Transportation

FIRSTGOV

Revised Operator  
Standards - June 2004Submit Pipeline and LNG  
Contact InformationAdvisory Bulletin  
New Mapping Requirements

Start

CC Technology ...

Microsoft PowerP...

National Pipelin...

Internet

2:36 PM

Pipeline operator contact for the geographic area you specified. ([Do another search](#))

| Pipeline Operator Name                  | Person to Contact                              | Entity to Contact      | Contact Address                               | Phone/Fax/Email  |
|---|--|------------------------|---|--|
| OKLAHOMA NATURAL GAS CO                 | DON SHERRY<br>(MANAGER III COMMUNICATIONS)     |                        | 401 N HARVEY,<br>OKLAHOMA CITY, OK 73101      | Phone: 4055516738<br>Email: dsherry@ong.com                                    |
| SOUTHERN STAR CENTRAL GAS PIPELINE, INC |  | Gas Control Department | Post Office Box 20010,<br>Owensboro, KY 42304 | Phone: 2708525000<br>Fax: 2708525010<br>Email: robert.s.bahnick@sscgp.com      |
| SUNOCO PIPELINE L.P.                    | Paul S. Broker (Vice President - Western Area) |                        | 907 South Detroit Avenue,<br>Tulsa, OK 74120  | Phone: 9185866422<br>Email: psbroker@sunocologistics.com                       |
| WILLIAMS PIPE LINE COMPANY              | Kenneth Lybarger<br>(Compliance Coordinator)   |                        | One Williams Center MD 27-2, Tulsa, OK 74172  | Phone: 9185730350<br>Fax: 9185731183<br>Email: kenneth.lybarger@magellanlp.com |



# **Successful Program Development**

## **Considerations for Integrity Management Program Development**

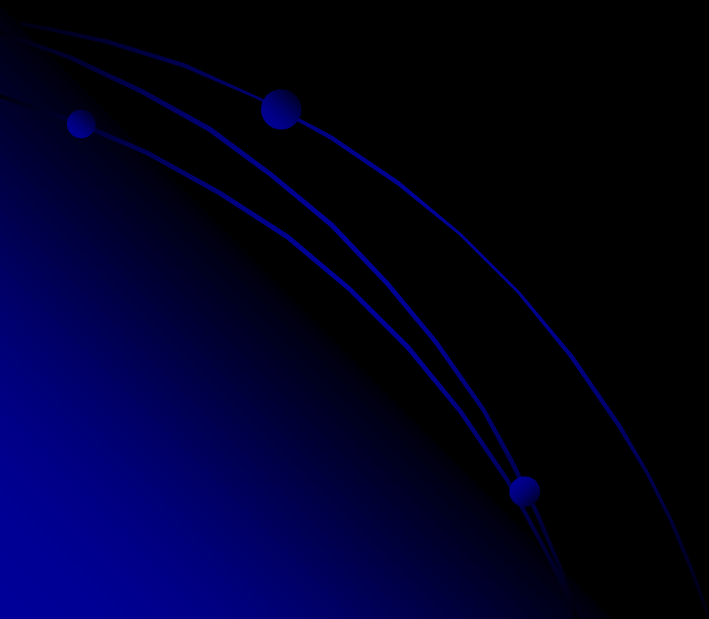


# Successful Program Development

- Rule Requires You to Develop an:  
“Integrity Management Program”
- An “Integrity Management Program” is:  
Collectively, a Set of Documents that  
Systematically Define, Control, and  
Implement Integrity Management

# Successful Gas IM Programs

- Program Development Begins with a “Framework”
  - Guiding Document For Integrity Management “Program” Development

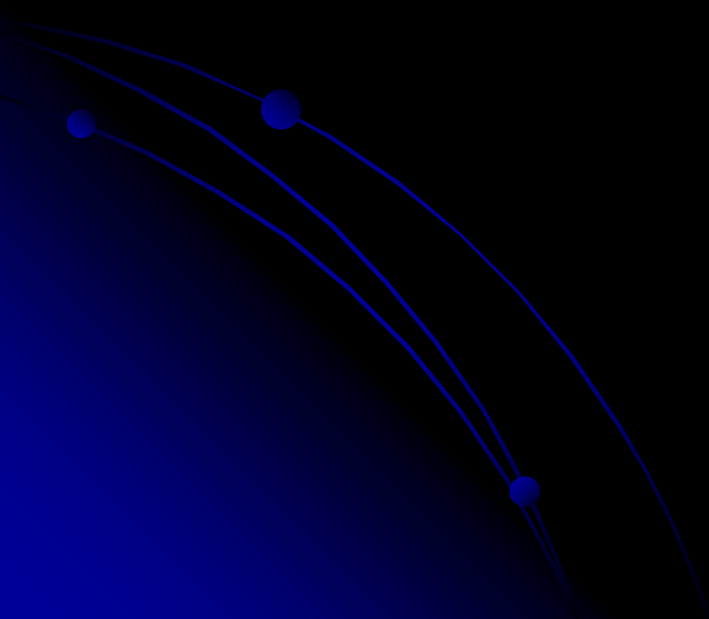


# Successful Gas IM Programs

- **Framework Outlines Development of Program Key Elements, Plans, and Processes:**
  - **Who (Responsibility)**
  - **What (Activity Required)**
  - **When (Schedules)**
  - **How (Improvements or Changes are Incorporated)**

# Successful Program Development

- The Framework Must Address the Required Key Integrity Management Program Elements Set Out In 192.911



# Program Elements

- **HCA Identification**
- **Baseline Assessment**
- **Threat/Risk ID**
- **DA Plan-if applicable**
- **Remediation**
- **Continual Evaluation**
- **Confirmatory DA**
- **Prev/Mitigative**
- **Performance Metrics**
- **Recordkeeping**
- **Mgt of Change**
- **Quality Control**
- **Communication Plan**
- **Submittals to Reg.**
- **Min. Env/Safety Risk**
- **Identify New HCAs**

# Successful Gas IM Programs

- **Successful Programs Include:**
  - **Identification of IM Task to be Accomplished**
  - **Details for How IM Tasks are to be Accomplished**
  - **Identification of Roles and Responsibilities for Completing The Tasks**

# Successful Gas IM Programs

- **Successful Programs Include:**
  - **Timelines for Completion of IM Tasks**
  - **Communication of IM Tasks Results to Key Personnel**
  - **Records & Documentation**



# Successful Gas IM Programs

- **For Successful Program Development:**
  - **Appropriate Resources Need to be Allocated**
  - **Build on Existing Programs (e.g., O&M)**

# Successful Gas IM Programs

- **For Successful Program Development:**
  - **Conduct Gap Analysis to Identify Missing Program or Process Elements**
  - **Plans and Supporting Processes are Expected to Improve with Time as Operators Gain Experience – Need Method and Triggers for Process Review**

# Successful Gas IM Programs

- **For Successful Program Development:**
  - **IM Plans and Processes Should be in Place Prior to Conducting an IM Activity**
  - **Framework is Acceptable for IM Activities Not Underway**

# Implementation

- **Follow IM Plan Processes and Procedures**
- **OPS Will Take an Example and Follow Through from Beginning to End to Verify Implementation**

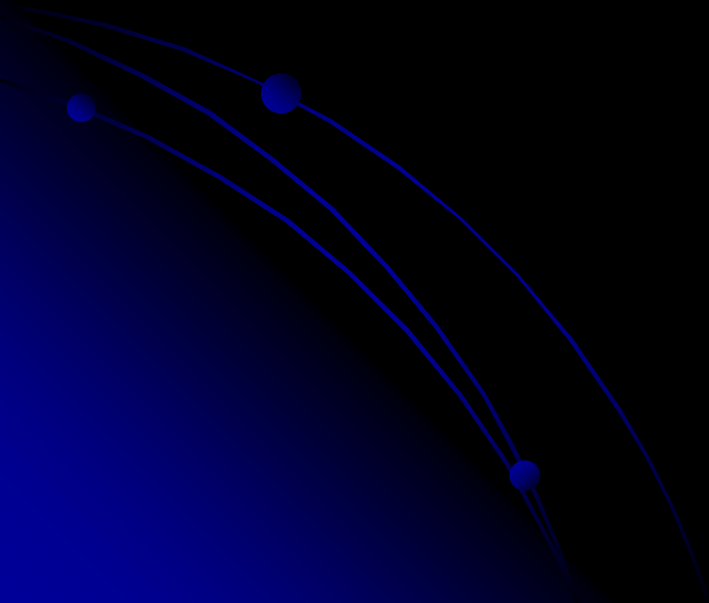
# Implementation

- **Develop Forms and Documentation to Demonstrate Program Implementation**
  - **Analysis Worksheets, Contracts, Repair Schedules, Assessment Datasheets, Memo's to File, GIS, Repair Records, MOC Forms, etc.**
  - **Printed or Electronic Formats**
  - **Demonstrate Compliance with Dates in the Rule**

# Operator Resources

**Gas Integrity Management Web Site:**

<http://primis.rspa.dot.gov/gasimp/>



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# Gas Integrity Management

Welcome to the Gas Transmission Pipeline Integrity Management (IM) web site. This web site is designed to provide information to regulators and pipeline operators on Gas Integrity Management including the final HCA Rule (49 CFR Part 192, §192.761), the Gas IM NPRM (49 CFR Part 192, §192.763), and the dialog related to finalizing, inspecting and enforcing provisions of the rules.



The information on this site will continue to evolve to ensure that it represents the most up-to-date reference on Gas IM for regulators and operators. We are currently in a public dialog designed to gather information that will help us better understand the perspective of our various stakeholders, including the public and the industry. Forums for these discussions include the [Gas IM Docket](#) and public meetings. Information on this public dialog will be incorporated on the web site as notes from any Public Meetings.

US Department of Transportation - Research and Special Programs Administration - Office of Pipeline Safety

# Operator Resources

- **Gas Integrity Management Web Site**
  - **Key Documents**
  - **Fact Sheet**
  - **Flowchart of Rule**
  - **Register and View Meetings**



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## Key Documents

Documents related to the Gas Transmission Pipeline Integrity Management process are available below. The most recent document are listed first.

- [July 22, 2004: \*Advisory Bulletin\*: "Semi-annual Reporting of Performance Measures for Gas Transmission Pipeline Integrity Management"](#)
- [June 28, 2004: Internal Inspection Device Rule](#)
- [May 26, 2004: Gas Transmission Rule \(Corrected\)](#)
  - [Combined Text \(original plus 2 corrections\)](#)
  - [Correction Only \(as published in Federal Register\)](#)
- [April 12, 2004: Notification Review Process \(Proposed\)](#)
- [April 6, 2004: Gas Transmission Rule \(Corrected\)](#)
  - [Correction Only \(as published in Federal Register\)](#)
- [December 15, 2003: Gas Transmission Rule \(as published in Federal Register\)](#)
- [October 8, 2003: Pipeline Safety: Stress Corrosion Cracking \(SCC\) Threat to Gas and Hazardous Liquid Pipelines](#)
- [November 17, 2003: Notice "Pipeline Safety: Guidance on When the Baseline Integrity Assessment Begins"](#)
- [July 17, 2003: \*Advisory Bulletin\*: "Identified Sites as Part of High Consequence Areas for Gas Integrity Management Programs"](#)
- [February 3, 2003: \*Advisory Bulletin\*: "Required Submission of Data to the National](#)

# Operator Resources

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## Gas Integrity Management "Fact Sheet"

### Objective:

Improve pipeline safety through:

- accelerating the integrity assessment of pipelines in High Consequence Areas,
- improving integrity management systems within companies,
- improving the government's role in reviewing the adequacy of integrity programs and plans, and
- providing increased public assurance in pipeline safety.

### Applicability:

The rule applies to gas transmission operators jurisdictional to 49 CFR Part 192. This rule becomes effective February 14, 2004.

In determining if an intrastate pipeline meets the definition of a transmission line set out in Part 192.3, an operator must consider the factors listed in 192.3(a)-(c) of the pipeline safety regulations. For a pipeline to be designated as distribution, the operator must document the reason(s) the pipeline does not meet one of the factors listed in 192.3(a)-(c). The terms "storage facility" and "distribution center" are not defined in the pipeline safety regulations. Therefore, for states participating in the Natural Gas Pipeline Safety Program, the OPS will recognize the individual state determination of these terms when designating a pipeline as a distribution or transmission pipeline. It is incumbent upon the operator to appropriately designate each of the pipelines in their system and document the basis for the determination.



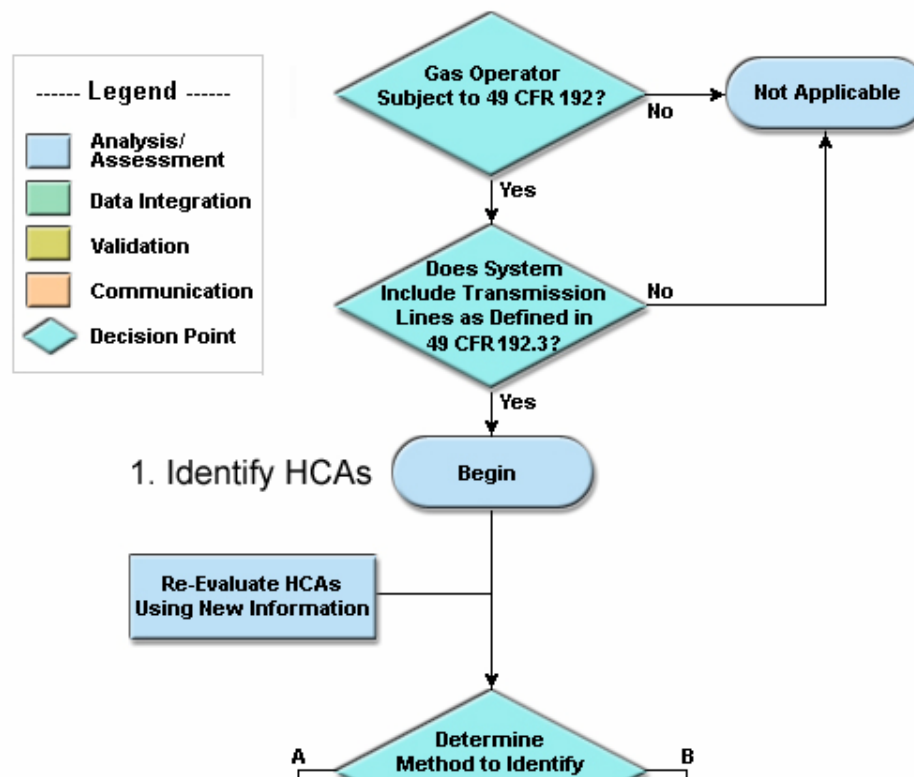
# Operator Resources

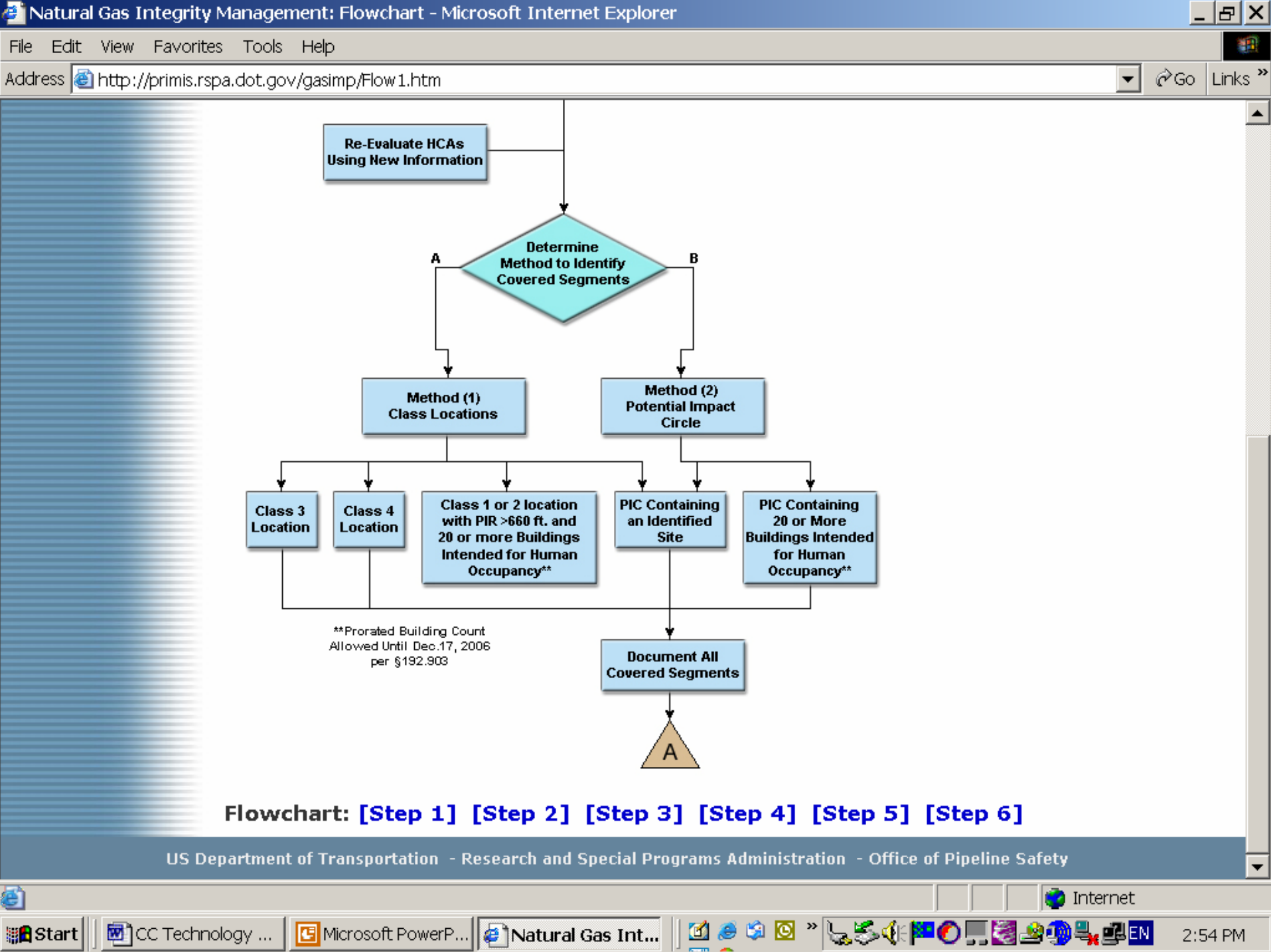
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# Natural Gas Integrity Management: Flowchart

## Determine Rule Applicability





# Operator Resources

- **Gas Integrity Management Web Site**
    - **Key Documents**
    - **Fact Sheet**
    - **Flowchart of Rule**
    - **Register and View Meetings**
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## Key Documents

## Performance Reporting

## Fact Sheet

## Flowchart

## Meetings

## FAOs

## Protocols

## Links

## Contacts

## Question or

## Hazardous L

## OPS Commu

**Register for Upcoming Meetings**

IM Workshop - May, 2004

Stress Corrosion Cracking - Dec, 2003

Direct Assessment - Nov. 2003

Washington, DC - May, 28, 2003

Dulles, Virginia - April, 25, 2003

Washington, DC - March, 27, 2003

Washington, DC - March, 14, 2003

Workshop - February, 20, 2003

**SUMMARY:** The Research and Special Programs Administration's (RSPA) Office of Pipeline Safety (OPS) and the National Association of Pipeline Safety Representatives (NAPSR) jointly sponsored a workshop to discuss the Gas Pipeline Integrity Management final rule issued on December 15, 2003. The workshop provided a detailed review and discussion of gas pipeline integrity management program requirements. Comments and issues discussed at the workshop will help RSPA/OPS and NAPSR implement oversight of operators' compliance with the gas pipeline integrity management rule.

3 IAPSR will hold another workshop in 2004 to provide further guidance on the  
4 s to be used. OPS will also provide written guidance material to help  
5 e for compliance.

y, May 11, 2004 (full day) and Wednesday, May 12, 2004 (half day).

## DOCUMENTS

1. [Meeting Notice \(FR\)](#) (Microsoft Word)
2. [Meeting Location and Details...](#)
3. [Agenda](#) (Microsoft Word)
4. [Presentation Slides](#) (3MB PowerPoint file)



# Operator Resources

- **Gas Integrity Management Web Site**
  - **Frequently Asked Questions (FAQs)**
  - **Draft Inspection Protocols**
  - **Links to Other Web Sites**
  - **Question or Comment**

## OPS Gas Integrity Management

## Frequently-Asked Questions (FAQ)

[HOME PAGE](#) [COMMENTS...](#)

For the FAQs posted OPS is soliciting feedback regarding technical issues to be considered in developing the answer to each specific FAQ. When an answer has been given proper consideration it will be posted with the related question on this site.

The content of Frequently Asked Questions (FAQs), and the answers thereto, are intended only to provide insight regarding an inspection team's current approach to a given issue. The purpose of FAQs is to facilitate communications with industry and other stakeholders, and to provide information to operators about OPS' inspection approach. Nothing in these FAQs, or the answers thereto, should be construed to represent interpretations or otherwise alter the intent of the rule. Requests for official written interpretations to the Gas Integrity Management rule may be requested in accordance with 49 CFR 190.11.

Sort By: [\[Category\]](#) [\[Faq Number\]](#) [\[Date Revised\]](#) [\[Category + Date\]](#)

- **General**

- **FAQ-1. What are the Office of Pipeline Safety's objectives for the Integrity Management rule?** [05/19/2004]

*Answer:* The integrity management rule has four primary objectives:

- accelerating the integrity assessment of pipelines in High Consequence Areas
- improving operator integrity management systems
- improving government's role in reviewing the adequacy of integrity programs and plans, and
- providing increased public assurance in pipeline safety.



- **FAQ-40. How often must periodic integrity assessments be performed on HCA pipeline segments after the baseline assessment is completed? [08/20/2004]**

*Answer: Under Development*

- **FAQ-41. Does the requirement that an operator establish inspection intervals not to exceed a specified number of years mean calendar years (i.e., pipe assessed in 2004 must be re-assessed during 2011) or actual years? [06/09/2004]**

*Answer:* Re-assessments must be conducted within the specified number of actual years. For example, a pipe segment assessed on March 23, 2004 must be re-assessed before March 23, 2011, using at least confirmatory direct assessment. This segment would need to be re-assessed using one of the methods specified in the rule before March 23, 2014, March 23, 2019 or March 23, 2024, depending on its operating stress (see [192.939](#)).

- **FAQ-42. Must operators conduct re-assessments before they have completed all baseline assessments? [05/17/2004]**

*Answer:* All baseline assessments must be completed by December 17, 2012, ten years after the enactment of the Pipeline Safety Improvement Act of 2002. Re-assessment intervals must be established for each covered segment and full reassessment, confirmatory direct assessment, or low-pressure reassessment must be performed within seven years after the baseline assessment for that segment is completed (or less if the operator's risk evaluation determines that a shorter interval is needed to assure pipeline integrity). Thus, some re-assessments will be required before all baseline assessments are completed if operators use the entire ten-year period to perform baseline assessments.

For example, a HCA pipeline segment that is assessed (baseline) in 2004 will require re-assessment no later than 2011.

- **FAQ-43. Can a re-assessment interval be extended beyond the maximum interval specified in 192.939? [05/17/2004]**

*Answer:* OPS can grant waivers from the reassessment intervals specified in [192.939](#) in instances in which appropriate inspection tools are not available or where conducting an assessment would imperil gas supply. Operators must apply for such waivers at least 180 days before the end of the

# Operator Resources

- **Gas Integrity Management Web Site**
  - **Frequently Asked Questions (FAQs)**
  - **Draft Inspection Protocols**
  - **Links to Other Web Sites**
  - **Question or Comment**

# Protocol Areas

Follow links below to see protocol elements for each area:

The draft OPS Inspection Protocols for implementing Gas Integrity Management are posted below for review and comment. Please note the Inspection Protocols are in *Draft* and are subject to change. Following the links for each protocol will provide additional detail and regulation references. If you would like to print the entire set of draft protocols for a given program element, use the **View as Form** link to display all the protocols. Comment on any Protocol can be submitted by using the **Question and Comments** link. Please identify the protocol for which you are providing comments by its unique alpha-numeric designation (e.g., A.1, A.2, etc.) .

## A. Identify HCAs

- B. Baseline Assessment Plan
- C. Identify Threats, Data Integration, and Risk Assessment
- D. DA Plan
- E. Remediation
- F. Continual Evaluation and Assessment
- G. Confirmatory DA
- H. Preventive and Mitigative Measures
- I. Performance Measures
- J. Record Keeping
- K. Management of Change (MOC)
- L. Quality Assurance
- M. Communications Plan
- N. Submittal of Program Documents
- O. Minimize Risks
- P. New HCAs



# Protocol Area A. Identify HCAs

[Home](#) [Protocol Areas](#) [View as Form](#)

Protocol: [A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#)

## A.1 Program Requirements

Verify that the methods defined in §192.903 High Consequence Area (1) and/or §192.903 High Consequence Area (2) are applied to each pipeline for the identification of high consequence areas. [§192.905(a)]

[\[See Details...\]](#)

## A.2 Potential Impact Radius

Verify that the definition and use of potential impact radius for establishment of high consequence areas meets the requirements of §192.903. [§192.905(a)]

[\[See Details...\]](#)

## A.3 Identified Sites

Verify that the operator's identification of identified sites includes the sources listed in §192.905(b) for those buildings or outside areas meeting the criteria specified by §192.903, and that the source of information selected is documented. [§192.903 Identified Sites, §192.905(b) and §192 Appendix E, I(c)]

[\[See Details...\]](#)

## A.4 Identification Using Class Locations (Method 1)

If the operator's integrity management program relies on §192.903 High Consequence Area definition (1) for identification of high consequence areas, verify compliance with the following:

[\[See Details...\]](#)

# Protocol Item A.1

[All Protocol Areas](#) [Protocol A](#) [Next »](#) [Last »»](#)

## A.1 Program Requirements

Verify that the methods defined in §192.903 High Consequence Area (1) and/or §192.903 High Consequence Area (2) are applied to each pipeline for the identification of high consequence areas. [§192.905(a)] [P,I]

- a. Verify the operator's integrity management program includes documented processes on how to implement methods (1) and (2) in order to identify high consequence areas. [§192.905(a)] [P]
- b. Verify that the operator's process requires that the method used for each portion of the pipeline system be documented. [§192.905(a)] [P,I]
- c. Verify that the operator's integrity management program includes system maps or other suitably detailed means documenting the pipeline segment locations that are located in high consequence areas. [§192.905(a)] [P,I]
- d. Review HCA records to verify that the operator completed identification of pipeline segments in high consequence areas by December 17, 2004. [§192.907, §192.911(a)] [P,I]

# Operator Resources

- **Gas Integrity Management Web Site**
  - **Frequently Asked Questions (FAQs)**
  - **Draft Inspection Protocols**
  - **Links to Other Web Sites**
  - **Question or Comment**



[Office of Pipeline Safety](#)  
[Research and Special Programs Administration](#)

## State Regulator Links

[National Association of Pipeline Safety Representatives](#)  
[National Association of Regulatory Utility Commissioners](#)

## Pipeline Industry Links

[American Gas Association](#)  
[Association of Oil Pipelines](#)  
[American Petroleum Institute](#)  
[American Public Gas Association](#)  
[Interstate Natural Gas Association of America](#)  
[Midwest Energy Association](#)  
[Northeast Gas Association](#)  
[Pipeline Research Council International, Inc.](#)  
[SGA](#)

## Other Links

[American National Standards Institute](#)  
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[ASME International](#)  
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[Associated General Contractors of America](#)  
[Common Ground Alliance](#)  
[Directional Crossing Contractors Association](#)  
[Gas Technology Institute](#)  
[Geospatial Information and Technology Association](#)  
[International Association of Fire Chiefs](#)  
[International Association of Fire Fighters](#)  
[Nace International](#)  
[National Association of State Fire Marshals](#)  
[National Fire Protection Association](#)

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# Questions and Comments for OPS

## Feedback Form

Save

Cancel

Your Name:

Your Email Address:

This data will be held privately by OPS, and used only for follow-up on your submittal.

Company/Affiliation:

Your Phone:

This data will be held privately by OPS, and used only for follow-up on your submittal.

Status:

Open

Nature of Feedback:

- ☒ Question
- ☐ Comment
- ☐ Problem or Bug Report
- ☐ Suggestion or Enhancement Request

**Please submit a separate form for each distinct subject matter. This helps us manage your input and ensure each item gets proper attention.**

Question or Comment:

Caution! The text entered in this field may be used partially or entirely on a public website, and may also be incorporated into Frequently Asked Questions (FAQ). Do not enter personal, proprietary, or security-related details in this field!

# Protocol Development

- **OPS and NAPSRS Created a Protocol Development Team of State and Federal Senior Inspectors**
  - **States of NY, LA, OH, NV, and AL**
- **Utilized Experience with Hazardous Liquid Integrity Management Protocol Development**
- **Goal of Keeping Inspection Protocols Tied Tightly to the Gas Integrity Management Regulation**

# Protocol Development

- **Draft Inspection Protocols Developed and Posted on Gas IM Public Website for Feedback**
  - **Also Reviewed by Industry Team Reviewing FAQs**
- **Pilot Testing of Inspection Protocols**
  - **Duke, El Paso, PG&E, and BG&E**
  - **Provided Live Setting for Testing Protocol Questions**

# Protocol Development

- **Pilot Testing of Inspection Protocols**
  - **Provided Feedback Regarding Protocol Questions**
  - **Provided Sense of Timing for Conducting Inspections**
  - **Provided a Sense of Protocol Order for Inspections**
- **Protocols Were Adjusted Based on the Pilot Testing and Are Posted on the Gas IM Public Website**

# Inspection Format

- **Inspection Teams will be Multi-Regional**
  - **Includes State Participation**
- **Pre-Inspection**
  - **Scheduled a Few Weeks Prior to Actual Inspection**
  - **Face to Face or by Conference Call**
  - **Coordinates Inspection Logistics – Where, Who, When, Etc.**

# Inspection Format

- **Inspections Estimated to be Two Weeks in Duration**
- **Inspection Team Will Caucus After Each Protocol Section**
  - **Provides Inspection Consistency**
  - **Assures Complete Communication of Issues**



# Inspection Format

- **Exit Interview Held at Completion of Each Week**
- **Operator Presentation of Process and Procedures for Completing a Task is Helpful**
  - **Plan Development, HCA Identification, Direct Assessment, MOC, Threat Analysis, etc.**

# Inspection Format

- **Inspection Teams will Check Implementation Using Vertical Slice of a Process**
  - Randomly select a process or procedure and follow it through to completion
- **Process and Implementation Audit**
  - Review of Operator Process and Implementation Records
  - Little, if any, Field Activity Planned

# State/Federal Coordination

- **Inter-state Agents Will Participate in Federal Inspections**
- **If Intra-state Pipelines are Included in an Operators Plan:**
  - **State Pipeline Safety Programs With Safety Authority will be Invited to Participate in the Federal Inspections**

# State/Federal Coordination

- **Intra-state Programs are Encouraged to Participate, however, Travel Budgets and Scheduling May Prohibit Their Participation**
- **Operators Prompted by OPS, Will be Asked to Extend the Invitation to Intrastate Programs**

# Inspector Training

- **Minimum Training Set Developed in Conjunction with NAPS**
  - **ILI, Corrosion, Joining, and Integrity Management (Protocol Training)**
- **CBT Development Underway – Direct Assessment, Risk Models, Management Systems**

# Actions For Successful Audit

- Have Detailed Processes and Procedures for Gas IM Activities Being Conducted
- Have a Framework for Processes and Procedures Under Development – Activities Not Being Conducted

# Actions For Successful Audit

- **Implement – Follow Your Processes and Framework**
- **Be Aware of Compliance Dates and Document Implementation**
- **Provide a Presentation on Development and Implementation of Each Protocol Section**

# Actions For Successful Audit

- **Provide OPS Access to IM Processes and Procedures Prior to Inspection via CDs or Web Access**
- **Take a Conservative Approach to Assumptions**
- **Follow FAQ Guidance**